

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELIZABETH CHAN, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
TRANSPORTATION, *et al.*,

Defendants.

Case No. 1:23-cv-10365 (LJL)

Case No. 1:24-cv-01644 (LJL)

MICHAEL MULGREW, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
TRANSPORTATION, *et al.*,

Defendants.

**NOTICE OF CROSS MOTION FOR
SUMMARY JUDGMENT BY THE
METROPOLITAN TRANSPORTATION
AUTHORITY, THE TRIBOROUGH
BRIDGE AND TUNNEL AUTHORITY,
THE NEW YORK CITY DEPARTMENT
OF TRANSPORTATION, AND
WILLIAM J. CARRY**

PLEASE TAKE NOTICE that, upon (1) the accompanying Memorandum of Law in Support of the Cross-Motion for Summary Judgment and Opposition to Plaintiffs' Motions for Summary Judgment and (2) the Administrative Record, Defendants the Metropolitan Transportation Authority, the Triborough Bridge and Tunnel Authority, the New York City Department of Transportation, and William J. Carry hereby move this Court for an order granting summary judgment pursuant to Federal Rule of Civil Procedure 56.

Dated: December 9, 2024

Respectfully submitted,

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